

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	X	
In re:	:	
DOCUDATA SOLUTIONS, L.C.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 75-2926166	:	Case No. 25-90023 (CML)
	X	
In re:	:	
BANCTEC (CANADA), INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. N/A	:	Case No. 25-90029 (CML)
	X	
In re:	:	
BANCTEC (PUERTO RICO), INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 66-0393420	:	Case No. 25-90031 (CML)
	X	
In re:	:	
BANCTEC GROUP LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 30-0809103	:	Case No. 25-90034 (CML)
	X	
In re:	:	
BANCTEC INTERMEDIATE HOLDING,	:	Chapter 11
INC.,	:	
Debtor.	:	
Tax I.D. No. 14-1857751	:	Case No. 25-90036 (CML)
	X	

-----	X	
In re:	:	
BANCTEC, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 75-1559633	:	Case No. 25-90039 (CML)
-----	X	
In re:	:	
BTC VENTURES, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 32-0040859	:	Case No. 25-90042 (CML)
-----	X	
In re:	:	
CHARTER LASON, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 41-2137542	:	Case No. 25-90044 (CML)
-----	X	
In re:	:	
CORPSOURCE HOLDINGS, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. N/A	:	Case No. 25-90047 (CML)
-----	X	
In re:	:	
DELIVEREX, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 51-0370088	:	Case No. 25-90049 (CML)
-----	X	

-----	X	
In re:	:	
DFG2 HOLDINGS, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 37-1703603	:	Case No. 25-90051 (CML)
-----	X	
In re:	:	
DFG2, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 38-3888322	:	Case No. 25-90053 (CML)
-----	X	
In re:	:	
ECONOMIC RESEARCH SERVICES, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 58-1454192	:	Case No. 25-90056 (CML)
-----	X	
In re:	:	
EXELA ENTERPRISE SOLUTIONS, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 13-3587073	:	Case No. 25-90058 (CML)
-----	X	
In re:	:	
EXELA FINANCE INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 82-1893089	:	Case No. 25-90060 (CML)
-----	X	

-----	X	
In re:	:	
EXELA INTERMEDIATE LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 82-1884342	:	Case No. 25-90025 (CML)
-----	X	
In re:	:	
EXELA RE LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 23-2981757	:	Case No. 25-90063 (CML)
-----	X	
In re:	:	
EXELA TECHNOLOGIES BPA, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 82-1880314	:	Case No. 25-90024 (CML)
-----	X	
In re:	:	
EXELA XBP, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 84-5080737	:	Case No. 25-90032 (CML)
-----	X	
In re:	:	
FTS PARENT INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 47-4616206	:	Case No. 25-90037 (CML)
-----	X	

-----	X	
In re:	:	
HOV ENTERPRISE SERVICES, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 22-3520617	:	Case No. 25-90040 (CML)
-----	X	
In re:	:	
HOV SERVICES, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 38-3384800	:	Case No. 25-90045 (CML)
-----	X	
In re:	:	
HOV SERVICES, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 26-0839966	:	Case No. 25-90048 (CML)
-----	X	
In re:	:	
HOVG, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 77-0611900	:	Case No. 25-90052 (CML)
-----	X	
In re:	:	
J & B SOFTWARE, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 23-2327305	:	Case No. 25-90055 (CML)
-----	X	

-----	X	
In re:	:	
KINSELLA MEDIA LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 52-2301194	:	Case No. 25-90065 (CML)
-----	X	
In re:	:	
LASON INTERNATIONAL, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 38-3402450	:	Case No. 25-90067 (CML)
-----	X	
In re:	:	
MANAGED CARE PROFESSIONALS, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 81-1143386	:	Case No. 25-90070 (CML)
-----	X	
In re:	:	
MERIDIAN CONSULTING GROUP, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 59-3770509	:	Case No. 25-90071 (CML)
-----	X	
In re:	:	
NEON ACQUISITION, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 80-0947559	:	Case No. 25-90026 (CML)
-----	X	

-----	X	
In re:	:	
NOVITEX ENTERPRISE SOLUTIONS	:	Chapter 11
CANADA, INC.	:	
Debtor.	:	
Tax I.D. No. N/A	:	Case No. 25-90072 (CML)
-----	X	
In re:	:	
NOVITEX GOVERNMENT SOLUTIONS,	:	Chapter 11
LLC,	:	
Debtor.	:	
Tax I.D. No. 30-0193564	:	Case No. 25-90073 (CML)
-----	X	
In re:	:	
NOVITEX HOLDINGS, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 38-3914247	:	Case No. 25-90075 (CML)
-----	X	
In re:	:	
NOVITEX INTERMEDIATE, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 80-0947386	:	Case No. 25-90077 (CML)
-----	X	
In re:	:	
PANGEA ACQUISITIONS INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 46-4861356	:	Case No. 25-90082 (CML)
-----	X	

-----	X	
In re:	:	
PLEXUS GLOBAL FINANCE, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 61-1694576	:	Case No. 25-90074 (CML)
-----	X	
In re:	:	
RC4 CAPITAL, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 80-0868892	:	Case No. 25-90076 (CML)
-----	X	
In re:	:	
RECOGNITION MEXICO HOLDING INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 30-0994449	:	Case No. 25-90078 (CML)
-----	X	
In re:	:	
REGULUS AMERICA LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 22-2974594	:	Case No. 25-90080 (CML)
-----	X	
In re:	:	
REGULUS GROUP II LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 26-4545318	:	Case No. 25-90028 (CML)
-----	X	

-----	X	
In re:	:	
REGULUS GROUP LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 23-2847269	:	Case No. 25-90030 (CML)
-----	X	
In re:	:	
REGULUS HOLDING INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 26-3714081	:	Case No. 25-90033 (CML)
-----	X	
In re:	:	
REGULUS INTEGRATED SOLUTIONS LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 52-2277055	:	Case No. 25-90035 (CML)
-----	X	
In re:	:	
REGULUS WEST LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 23-2866282	:	Case No. 25-90038 (CML)
-----	X	
In re:	:	
RUST CONSULTING, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 41-1813634	:	Case No. 25-90041 (CML)
-----	X	

-----	X	
In re:	:	
RUSTIC CANYON III, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. N/A	:	Case No. 25-90043 (CML)
-----	X	
In re:	:	
SERVICES INTEGRATION GROUP, L.P.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 76-0531355	:	Case No. 25-90046 (CML)
-----	X	
In re:	:	
SIG – GP, L.L.C.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. N/A	:	Case No. 25-90050 (CML)
-----	X	
In re:	:	
SOURCECORP BPS INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 51-0370086	:	Case No. 25-90054 (CML)
-----	X	
In re:	:	
SOURCECORP LEGAL INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 58-2482419	:	Case No. 25-90057 (CML)
-----	X	

-----	X	
In re:	:	
SOURCECORP MANAGEMENT, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 75-2912986	:	Case No. 25-90059 (CML)
-----	X	
In re:	:	
SOURCECORP, INCORPORATED,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 75-2560895	:	Case No. 25-90061 (CML)
-----	X	
In re:	:	
SOURCEHOV CANADA COMPANY,	:	Chapter 11
Debtor.	:	
Tax I.D. No. N/A	:	Case No. 25-90062 (CML)
-----	X	
In re:	:	
SOURCEHOV HEALTHCARE, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 57-0835087	:	Case No. 25-90064 (CML)
-----	X	
In re:	:	
SOURCEHOV HOLDINGS, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 68-0683138	:	Case No. 25-90066 (CML)
-----	X	

-----	X	
In re:	:	
SOURCEHOV LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 26-2270219	:	Case No. 25-90068 (CML)
-----	X	
In re:	:	
TRAC HOLDINGS, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 20-5736962	:	Case No. 25-90069 (CML)
-----	X	
In re:	:	
TRANSCENTRA, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 32-0345387	:	Case No. 25-90079 (CML)
-----	X	
In re:	:	
UNITED INFORMATION SERVICES, INC.,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 42-1446157	:	Case No. 25-90081 (CML)
-----	X	
In re:	:	
XCV-EMEA, LLC,	:	Chapter 11
Debtor.	:	
Tax I.D. No. 88-3869335	:	Case No. 25-90027 (CML)
-----	X	

**EMERGENCY MOTION OF DEBTORS FOR ENTRY OF AN ORDER
DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

Emergency relief has been requested. Relief is requested not later than 10:30 a.m. (prevailing Central Time) on March 4, 2025.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

A hearing will be conducted on this matter on March 4, 2025 at 10:30 a.m. (prevailing Central Time) in Courtroom 401, 4th floor, 515 Rusk Street, Houston, Texas 77002.

Participation at the hearing will only be permitted by an audio and video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at 832-917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez's conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's home page. The meeting code is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Lopez's

The above-captioned debtors in possession (collectively, the "***Debtors***") respectfully state as follows in support of this motion (this "***Motion***"):

RELIEF REQUESTED

1. By this Motion, the Debtors seek entry of an order, substantially in the form attached hereto (the "***Proposed Order***"), directing the joint administration of their above-captioned chapter 11 cases for procedural purposes only and granting related relief. The Debtors request that one file and one docket be maintained for all of the jointly administered cases under the case of DocuData Solutions, L.C., Case No. 25-90023 (CML) and that the cases be administered under a consolidated caption, as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	X	
	:	
In re:	:	Chapter 11
	:	
DOCUDATA SOLUTIONS, L.C., <i>et al.</i> ,	:	Case No. 25-90023 (CML)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
	X	

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://omniagentsolutions.com/DocuDataSolutions>. The Debtors' mailing address for the purposes of these cases is 2701 E. Grauwyler Road, Irving, TX 75061 USA.

2. The Debtors further request that the Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “*Bankruptcy Code*”).

3. The Debtors also request that a docket entry, substantially similar to the following, be entered on the docket of each of the Debtors, other than DocuData Solutions, L.C., to reflect the joint administration of the chapter 11 cases:

An order has been entered in this case consolidating this case with the case of DocuData Solutions, L.C., Case No. 25-90023 (CML) for procedural purposes only and providing for its joint administration in accordance with the terms thereof. The docket in Case No. 25-90023 (CML) should be consulted for all matters affecting this case.

JURISDICTION AND VENUE

4. The United States Bankruptcy Court for the Southern District of Texas (the “*Court*”) has jurisdiction to consider this Motion under 28 U.S.C. § 1334. This is a core

proceeding pursuant to 28 U.S.C. § 157(b) and the Court may enter a final order consistent with Article III of the United States Constitution.

5. Venue of these cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

6. The statutory and legal predicates for the relief requested herein are sections 105(a) and 342(c) of the Bankruptcy Code, Rules 1005, 1015 and 2002 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 1015-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”), and the Procedures for Complex Cases in the Southern District of Texas (the “**Complex Case Procedures**”).

BACKGROUND

7. On the date hereof (the “**Petition Date**”), the Debtors filed voluntary petitions in the Court commencing cases for relief under chapter 11 of the Bankruptcy Code (the “**Chapter 11 Cases**”). The Debtors continue to manage and operate their businesses as debtors in possession under sections 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been requested and no committee has been appointed in the Chapter 11 Cases.

8. The factual background regarding the Debtors, including their business operations, their capital and debt structures, and the events leading to the filing of the Chapter 11 Cases, is set forth in detail in the *Declaration of Randall S. Eisenberg in Support of Chapter 11 Petitions and First Day Motions*, filed contemporaneously herewith (the “**First Day Declaration**”), which is fully incorporated herein by reference.¹

¹ Capitalized terms used but not defined herein have the meanings given to them in the First Day Declaration.

9. Members of an ad hoc group of holders of the Debtors' 11.5% secured notes due 2026² (the "***April 2026 Notes***") holding, in aggregate, approximately 73.7% of unaffiliated bonds (the "***Ad Hoc Group***") have agreed to provide postpetition financing to the Debtors in the amount of \$80 million of new money (the "***DIP Facility***"). Upon emergence, the DIP Facility will roll into an exit facility, totaling \$245 million, comprised of the DIP Facility, plus \$60 million in additional new money, certain fees, and April 2026 Notes that were rolled up into the DIP Facility.

10. In connection with the entry into the DIP Facility, the Debtors reached an agreement with the Ad Hoc Group on a non-binding term sheet (the "***Restructuring Term Sheet***") that contemplates an expedited "prearranged" chapter 11 plan that will be filed shortly after the commencement of the cases implementing the terms of the Restructuring Term Sheet. The Restructuring Term Sheet also enjoys the support of entities affiliated with the Debtors holding, in aggregate, approximately 30.7% of April 2026 Notes (the "***Affiliated Bondholders***"). Accordingly, in total, the Restructuring Term Sheet has the support of holders of over 81.7%, in aggregate, of outstanding April 2026 Notes.

11. Pursuant to the Restructuring Term Sheet, the Debtors, the Ad Hoc Group, and the Affiliated Bondholders will have ten (10) business days from the Petition Date to reach agreement on the terms of a restructuring support agreement and plan of reorganization that will implement the transactions contemplated by the Restructuring Term Sheet, subject to a further ten (10) business-day extension. Accordingly, in the days following the commencement of the Chapter 11 Cases, the Debtors intend to enter into a restructuring support agreement and file a chapter 11 plan of reorganization consistent with the Restructuring Term Sheet, along with a corresponding

² Debtors Exela Intermediate LLC and Exela Finance, Inc. are co-issuers and the other Debtors are guarantors under the 11.5% secured notes due 2026.

disclosure statement and motion for approval of the disclosure statement and associated solicitation procedures. To minimize the disruption to the Debtors' business and any associated erosion of value, the Debtors intend to seek confirmation of their chapter 11 plan of reorganization as quickly as the Court's schedule and requisite notice periods will permit.

BASIS FOR RELIEF

12. Bankruptcy Rule 1015(b) provides, in relevant part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b)(4).

13. Section 101(2) of the Bankruptcy Code, in turn, defines the term “affiliate” in pertinent part, as:

(A) [an] entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor . . . ;

(B) [a] corporation 20 percent or more of whose outstanding voting securities are directly or indirectly owned, controlled, or held with power to vote, by the debtor, or by an entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor . . . ;

(C) [a] person whose business is operated under a lease or operating agreement by a debtor, or person substantially all of whose property is operated under an operating agreement with the debtor; or

(D) [an] entity that operates the business or substantially all of the property of the debtor under a lease or operating agreement.

11 U.S.C. § 101(2).

14. The Debtors are “affiliates” of each other as that term is defined in section 101(2) of the Bankruptcy Code. Specifically, section 101(2)(A) of the Bankruptcy Code provides that an “affiliate” is an “entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor” 11 U.S.C. § 101(2)(A).

Here, the Debtors are affiliates of one another because, as reflected in the organizational chart attached as Exhibit A-1 to the First Day Declaration, Non-Debtor Exela Technologies, Inc. owns, either directly or indirectly, 20% or more of the outstanding ownership interests in each of the Debtors. As such, the Debtors are “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code and as used in Bankruptcy Rule 1015(b). Accordingly, the Bankruptcy Code and Bankruptcy Rules authorize the Court to grant the relief requested herein.

15. Bankruptcy Local Rule 1015-1 provides additional authority for the Court to order joint administration of the Chapter 11 Cases. *See* BLR 1015-1 (stating the procedure for filing motions and proposed orders for joint administration). The Debtors have filed this Motion in compliance with the Bankruptcy Local Rules.

16. Joint administration will ease the administrative burden on the Court and all parties in interest by, among other things, eliminating the need for duplicative pleadings, notices, and orders in each of the respective dockets and saving the Court, the Debtors, and other parties in interest substantial time and expense when preparing and filing such documents. Further, joint administration will protect parties in interest by ensuring that they will be apprised of the various motions filed with the Court with respect to each of the Debtors’ cases.

17. Moreover, joint administration will not adversely affect the Debtors’ respective constituencies because this Motion seeks only administrative combination, and not substantive consolidation, of the Debtors’ estates. Each creditor and party in interest will maintain whatever rights it has against the particular estate in which it allegedly has a claim or right. In addition, all creditors will benefit from the reduction in costs that will result from joint administration. Thus, the Debtors submit that joint administration of the Chapter 11 Cases is in the best interests of their estates, their creditors, and all parties in interest.

18. Finally, the Debtors submit that use of the simplified caption, without reference to the Debtors' tax identification numbers, addresses, and previous names, will eliminate cumbersome and confusing procedures and ensure uniformity of pleading identification. Other case-specific information will be listed in the petitions for the respective Debtors and such petitions are publicly available, including on the restructuring website maintained by the Debtors that is free to access, and will be provided by the Debtors upon request. Therefore, the Debtors submit the policies behind the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n) have been fully satisfied.³

19. For these reasons, the Debtors submit that the relief requested herein is necessary and appropriate, is in the best interest of their respective estates and creditors, and should be granted in all respects.

EMERGENCY CONSIDERATION

20. The Debtors respectfully request emergency consideration of this Motion pursuant to Bankruptcy Local Rule 9013-1(i) and Complex Case Procedures. The Debtors believe that an immediate and orderly transition into chapter 11 is critical to the viability of their operations and the success of the Chapter 11 Cases. As discussed in detail above, the joint administration of the Chapter 11 Cases will ease the administrative burden on the Court and all parties while saving time and estate resources. Accordingly, the Debtors submit that they have satisfied the standard of Bankruptcy Local Rule 9013-1(i), and the Debtors believe that emergency consideration is necessary and respectfully request that this Motion be heard on an emergency basis.

³ Bankruptcy Rule 1005 requires petition captions to include the name of the court, the title of the case (including the Debtor's name, employer identification number or other taxpayer identification number, and all other names used within eight years before filing the petition), and the docket number. Bankruptcy Rule 2002(n) requires that the caption on notices comply with Bankruptcy Rule 1005.

NOTICE

21. Notice of the Motion will be given to: (a) the Office of the United States Trustee for the Southern District of Texas; (b) counsel to the DIP Agent; (c) counsel to the Ad Hoc Group; (d) counsel to the Prepetition Indenture Trustee; (e) counsel to the administrative agent under the ER3 Securitization Program; (f) counsel to B. Riley; (g) the creditors listed on the Debtors' consolidated list of thirty (30) creditors holding the largest unsecured claims; (h) the United States Attorney for the Southern District of Texas; (i) the Internal Revenue Service; (j) the Securities and Exchange Commission; (k) the state attorneys general for states in which the Debtors conduct business; and (l) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, under the circumstances, no other or further notice is required.

22. A copy of the Motion is available on (a) the Court's website, at www.txs.uscourts.gov, and (b) the website maintained by the Debtors' proposed claims and noticing agent, Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/DocuDataSolutions>.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order granting the relief requested in the Motion and such other and further relief as may be just and proper.

Dated: March 3, 2025
Houston, Texas

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

HUNTON ANDREWS KURTH LLP

Timothy A. ("Tad") Davidson II (Texas Bar No. 24012503)

Ashley L. Harper (Texas Bar No. 24065272)

Philip M. Guffy (Texas Bar No. 24113705)

600 Travis Street, Suite 4200

Houston, TX 77002

Telephone: (713) 220-4200

Email: taddavidson@hunton.com

ashleyharper@hunton.com

pguffy@hunton.com

- and -

LATHAM & WATKINS LLP

Ray C. Schrock (NY Bar No. 4860631)

Alexander W. Welch (NY Bar No. 5624861)

Hugh Murtagh (NY Bar No. 5002498)

Adam S. Ravin (NY Bar No. 4079190)

Jonathan J. Weichselbaum (NY Bar No. 5676143)

1271 Avenue of the Americas

New York, NY 10020

Telephone: (212) 906-1200

Email: ray.schrock@lw.com

alex.welch@lw.com

hugh.murtagh@lw.com

adam.ravin@lw.com

jon.weichselbaum@lw.com

*Proposed Co-Counsel for the Debtors
and Debtors in Possession*

CERTIFICATE OF SERVICE

I certify that on March 3, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II
Timothy A. ("Tad") Davidson II